

EG&G ROCKY FLATS, INC.
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91-RF-2167

Attn: F. R. Lockhart

EPA CONCERNS, OPERABLE UNIT NO. 5 (OU 5), OLD LANDFILL - JMK-0016-91

1. Addition of three air monitoring stations,
2. Addition of two surface water monitoring sites,
3. Placement of a soil stabilizer over areas of the Old Landfill that have been identified by two types of radiological surveys, and
4. Dumping at Old Landfill.

Issue 1 (Air Monitoring):

EPA representatives have stated that baseline risk assessment data should be collected prior to any activities at OU 5 in order to determine impacts from the remedial activities to be completed at a later date. This means that electrical power for air monitoring stations should be installed immediately. However, EG&G Facilities Engineering has indicated it could take up to one year to install electrical power to the proposed air monitoring sites. The Field Sampling Plan schedule requires implementation to begin in October 1991; if air monitoring is to be operational at the same time that the field sampling is to begin, the schedule for the field sampling will have to be changed.

Another issue was raised during a conversation with Patricia Corbetta of the EPA regarding the proposed locations of the air monitors. Ralph Porter of EG&G selected the locations for the three air monitors with EPA/CDH, DOE, and other EG&G personnel during a site visit in January 1991. The location was determined as a result of the terrain and knowledge of RFP meteorological conditions since site-specific meteorological data for the Old Landfill is not available. These locations place the air monitors where they will measure the greatest impacts and still be out of the way of remedial activities at the Old Landfill.

CLASSIFICATION:

UCNI	No	X	
INCLASSIFIED		X	
CONFIDENTIAL			
SECRET			

AUTHORIZED CLASSIFIER
SIGNATURE

DATE 4/17/91
IN REPLY TO LTR NO. 100

C#
TR APPROVALS:
CG-
E-
ORIG & TYPE INITIALS
TO: pif

ADMIN RECORD

A-OU05-000176

REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Ostdiek 870
DATE 6-9-93

Other air monitoring issues at OU 5 are the use of existing Radioactive Ambient Air Monitoring Program (RAAMP) air monitors and the use of the RAAMP database to establish baseline or background data. EG&G is concerned that the RAAMP database is currently only analyzing samples for plutonium. EG&G is modifying the sitewide air monitoring program to include the additional isotopes and compounds of interest. EG&G has not planned to start an air sampling program before the initiation of OU 5 field operations.

Issue 2 (Surface Water Monitoring):

Two additional surface water sampling stations for OU 5 were identified and located by EPA/CDH, DOE, and EG&G personnel during a site visit in January 1991. The stations are to be sampled as part of the OU 5 Field Sampling Program starting at the end of October 1991.

Issue 3 (Soil Stabilization):

Soil stabilization measures performed at the "Old Landfill" will be processed as an "Interim Measure/Interim Remedial Action" (IM/IRA) in accordance with the IAG. The administrative process for an IM/IRA as outlined in the IAG consists of approximately 410 working days, which requires public review and comment.

The intent of the IAG was to perform environmental restoration measures at RFP relative to the IAG schedule that was negotiated between DOE, EPA, and CDH. Pursuant to the IAG schedule for OU 5, resources have not been allocated in FY91 to perform an IM/IRA for immediate soil stabilization measures for the "Old Landfill."

EG&G had not planned to begin soil stabilization before the initiation of OU 5 field operations and will need specific direction from DOE to do so, because the soil stabilization will require additional funding since it is outside the Scope of Work and schedule of OU 5. We have given the task some thought, however, and believe that long-term soil stabilization of the Old Landfill can best be achieved through revegetation of the disturbed soil. In order to obtain a quick vegetative cover of perennial grasses, the vegetation plan consists of the following activities:

- Lincoln smooth brome (Bromus inermis) broadcast at a rate of 26 pounds per acre of pure live seed. The grass seed will be broadcast rather than drilled over the steep slopes and over the entire surface of the landfill (approximately five acres).
- Mulching will follow seeding using a long-stemmed, weed-free native-grass hay mulch at a rate of two tons per acre. The mulch will be held in place with a plastic netting stapled to the soil. The mulch will provide a ground cover to control soil movement until the grass becomes established.

Issue 4 (Dumping at Old landfill):

A letter instructing that EG&G should not use the Old Landfill as a dumping site for street-sweeping litter and concrete truck wash-out was sent to EG&G RFP's Trucking, Labor, and Garage Departments.

Robert M. Nelson, Jr.
July 29, 1991
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We have been working with your staff to resolve the issues. Please contact T. C. Greengard at extension 7121 or J. T. Ottensman at extension 3198 of Remediation Programs to discuss these issues further.



J. M. Kersh, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc.

JTO:plf

Orig. and 2 cc - R. M. Nelson, Jr.

cc:

T. T. Olsen - DOE, RFO